Hearing Date: March 8, 2017 at 11:00 a.m.

Susheel Kirpalani James C. Tecce Jordan Harap QUINN EMANUEL URQUHART & SULLIVAN, LLP 51 Madison Avenue, 22<sup>nd</sup> Floor New York, NY 10010

Proposed Special Litigation Counsel to William A. Brandt Jr., Chapter 11 Trustee for CFG Peru Investments Pte. Ltd. (Singapore)

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	V	
In re:	: :	Case No. 16-11895 (JLG)
CHINA FISHERY GROUP LIMITED (CAYMAN), <u>et al.</u> ,	; ; ;	Chapter 11 (Jointly Administered)
Debtors. <sup>1</sup>	:	
In re:	X :	Case No. 16-11914 (JLG)
CFG PERU INVESTMENTS PTE. LTD. (SINGAPORE),	:	Chapter 11
Debtor.	:	

NOTICE OF HEARING ON MOTION OF WILLIAM A. BRANDT, JR., CHAPTER 11 TRUSTEE FOR CFG PERU INVESTMENTS PTE. LTD. (SINGAPORE), PURSUANT TO 11 U.S.C. §§ 105(a) AND 1106(a)(3), FED. R. BANKR. P. 2004 AND 9016, AND L. BANKR. R. 2004-1, FOR ORDER AUTHORIZING ISSUANCE OF SUBPOENAS TO HONGKONG SHANGHAI BANKING CORPORATION LIMITED DIRECTING PRODUCTION OF DOCUMENTS AND EXAMINATION OF WITNESSES AND GRANTING RELATED RELIEF

The Debtors in Case No. 16-11895 (JLG) are China Fishery Group Limited (Cayman) ("<u>CFGL</u>"), Pacific Andes International Holdings Limited (Bermuda) ("<u>PAIH</u>"), N.S. Hong Investment (BVI) Limited ("<u>NS Hong</u>"), South Pacific Shipping Agency Limited (BVI) ("<u>SPSA</u>"), China Fisheries International Limited (Samoa) ("<u>CFIL</u>"), CFGL (Singapore) Private Limited ("<u>CFGLPL</u>"), Chanery Investment Inc. (BVI) ("<u>Chanery</u>"), Champion Maritime Limited (BVI) ("<u>Champion</u>"), Growing Management Limited (BVI) ("<u>Growing Management</u>"), Target Shipping Limited (HK) ("<u>Target Shipping</u>"), Fortress Agents Limited (BVI) ("<u>Fortress</u>"), Ocean Expert International Limited (BVI) ("<u>Ocean Expert</u>"), Protein Trading Limited (Samoa) ("<u>Protein Trading</u>"), CFG Peru Investments Pte. Limited (Singapore) ("<u>CFG Peru Singapore</u>"), Smart Group Limited (Cayman) ("<u>Smart Group</u>"), Super Investment Limited (Cayman) ("<u>Super</u> Investment"), and Pacific Andes Resources Development Ltd. ("PARD").

PLEASE TAKE NOTICE that on December 27, 2016, William A. Brandt, Jr., the Chapter 11 Trustee (the "Trustee") for the bankruptcy estate of CFG Peru Investments Pte. Ltd. (Singapore) (the "Debtor"), filed the Motion of William A. Brandt, Jr., Chapter 11 Trustee, Pursuant to 11 U.S.C. §§ 105(a) and 1106(a)(3), Fed. R. Bankr. P. 2004 and 9016, and L. Bankr. R. 2004-1, For Order Authorizing Issuance of Subpoenas to Hongkong Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses and granting Related Relief (the "Rule 2004 Motion") [ECF No. 299 (Case No. 16-11895); ECF No. 50 (Case No. 16-11914)].

PLEASE TAKE FURTHER NOTICE that on February 6, 2017, HSBC North America Holdings Inc., HSBC North America, Inc., and HSBC USA Inc. (collectively, "HSBC-US") filed HSBC North America Holdings Inc., HSBC North America Inc., and HSBC USA Inc. 's Objection to the Motion of William A. Brandt, Jr., Chapter 11 Trustee for CFG Peru Investments Pte. Ltd. (Singapore), For Order Authorizing Issuance of Subpoenas to Hongkong and Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses (the "HSBC US Rule 2004 Objection") [ECF No. 341 (Case No. 16-11895); ECF No. 72 (Case No. 16-11914)].

PLEASE TAKE FURTHER NOTICE that on February 6, 2017, the Hongkong Shanghai Banking Corporation Limited ("HSBC-HK") filed the Objection of the Hongkong and Shanghai Banking Corporation Limited to the Motion of William A. Brandt, Jr., Chapter 11 Trustee, Pursuant to 11 U.S.C. §§ 105(A) and 1106(A)(3), Fed. R. Bankr. P. 2004 and 9016, and L. Bankr. R. 2004-1, For Order Authorizing Issuance of Subpoenas to Hongkong Shanghai Banking Corporation Limited Directing Production of Documents and Examination of Witnesses and Granting Related Relief (the "HSBC-HK Rule 2004 Objection", and together with the

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HSBC-US Rule 2004 Objection, the "Rule 2004 Objections") [ECF No. 344 (Case No. 16-11895)].

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Rule 2004 Objections will occur on Wednesday, March 8, 2017 at 11:00 a.m. (prevailing Eastern Time) at the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004-1408, in the courtroom of the Honorable James L. Garrity, Jr., United States Bankruptcy Judge (the "**Hearing Date**").

Dated: February 7, 2017 New York, New York

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ SUSHEEL KIRPALANI
Susheel Kirpalani
James C. Tecce
Jordan Harap

51 Madison Avenue, 22nd Floor New York, New York 10010